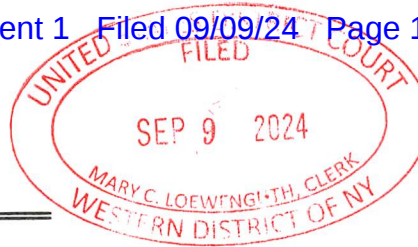


**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK**



Revised 07/07 WDNY

Quania Crittenden  
29 Boswell Place  
Tonawanda, NY 14150  
Name(s) of Plaintiff or Plaintiffs

Jury Trial Demanded: Yes ☒ No ☐**24 CV 837**

-VS-  
The Irish Banshee Pub  
257 Franklin Street  
Buffalo, NY 14202  
Name of Defendant or Defendants

**DISCRIMINATION COMPLAINT**-CV-

You should attach a copy of your **original Equal Employment Opportunity Commission (EEOC) complaint**, a copy of the Equal Employment Opportunity Commission **decision**, **AND** a copy of the **"Right to Sue"** letter you received from the EEOC to this complaint. Failure to do so may delay your case.

**Note:** Only those grounds raised in the charge filed with the Equal Employment Opportunity Commission can be considered by the federal district court under the federal employment discrimination statutes.

This action is brought for discrimination in employment pursuant to (*check only those that apply*):

☒ Title VII of the Civil Rights Act of 1964, as codified, 42 U.S.C. §§ 2000e to 2000e-17 (amended in 1972, 1978 and by the Civil Rights Act of 1991, Pub.L.No. 102-166) (race, color, gender, religion, national origin).

**NOTE:** In order to bring suit in federal district court under Title VII, you **must first obtain a right to sue letter** from the Equal Employment Opportunity Commission.

☐ Age Discrimination in Employment Act of 1967, as codified, 29 U.S.C. §§ 621-634 (amended in 1984, 1990, and by the Age Discrimination in Employment Amendments of 1986, Pub.L.No. 99-592, the Civil Rights Act of 1991, Pub.L.No. 102-166).

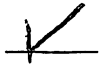
**NOTE:** In order to bring suit in federal district court under the Age Discrimination in Employment Act, you **must first file charges** with the Equal Employment Opportunity Commission.

☐ Americans with Disabilities Act of 1990, as codified, 42 U.S.C. §§ 12112-12117 (amended by the Civil Rights Act of 1991, Pub.L.No. 102-166).

**NOTE:** In order to bring suit in federal district court under the Americans with Disabilities Act, you **must first obtain a right to sue letter** from the Equal Employment Opportunity Commission.

**JURISDICTION** is specifically conferred upon this United States District Court by the aforementioned statutes, as well as 28 U.S.C. §§ 1331, 1343. Jurisdiction may also be appropriate under 42 U.S.C. §§ 1981, 1983 and 1985(3), as amended by the Civil Rights Act of 1991, Pub.L.No. 102-166, and any related claims under New York law.

In addition to the federal claims indicated above, you may wish to include New York State claims, pursuant to 28 U.S.C. § 1367(a).



New York State Human Rights Law, N.Y. Exec. Law §§ 290 to 297 (age, race, creed, color, national origin, sexual orientation, military status, sex, disability, predisposing genetic characteristics, marital status).

#### PARTIES

1. My address is: 29 Boswell Place Tonawanda, NY  
14150

My telephone number is: 716-923-5143

2. The name of the employer(s), labor organization, employment agency, apprenticeship committee, state or local government agency who I believe discriminated against me is/are as follows:

Name: The Irish Banshee Pub

Number of employees: 15-100 Employees

Address: 257 Franklin Street Buffalo, NY 14202

3. (If different than the above), the name and/or the address of the defendant with whom I sought employment, was employed by, received my paycheck from or whom I believed also controlled the terms and conditions under which I were paid or worked. (For example, you worked for a subsidiary of a larger company and that larger company set personnel policies and issued you your paycheck).

Name: \_\_\_\_\_

Address: \_\_\_\_\_

#### CLAIMS

4. I was first employed by the defendant on (date): 10/29/2022

5. As nearly as possible, the date when the first alleged discriminatory act occurred is: 12/05/2022
6. As nearly as possible, the date(s) when subsequent acts of discrimination occurred (if any did): \_\_\_\_\_
7. I believe that the defendant(s)
- a. \_\_\_\_\_ Are still committing these acts against me.
- b. X Are not still committing these acts against me.
- (Complete this next item **only** if you checked "b" above) The last discriminatory act against me occurred on (date) 12/05/2022
8. (Complete this section **only** if you filed a complaint with the New York State Division of Human Rights)
- The date when I filed a complaint with the New York State Division of Human Rights is \_\_\_\_\_
- \_\_\_\_ (estimate the date, if necessary)
- I filed that complaint in (identify the city and state): \_\_\_\_\_
- The Complaint Number was: \_\_\_\_\_
9. The New York State Human Rights Commission did \_\_\_\_\_ /did not \_\_\_\_\_ issue a decision. (NOTE: If it **did** issue a decision, you **must attach** one copy of the decision to **each** copy of the complaint; failure to do so will delay the initiation of your case.)
10. The date (if necessary, estimate the date as accurately as possible) I filed charges with the Equal Employment Opportunity Commission (EEOC) regarding defendant's alleged discriminatory conduct is: 12/10/2022
11. The Equal Employment Opportunity Commission did ✓ /did not \_\_\_\_\_ issue a decision. (NOTE: If it **did** issue a decision, you **must attach** one copy of the decision to **each** copy of the complaint; failure to do so will delay the initiation of your case.)
12. The Equal Employment Opportunity Commission issued the attached Notice of Right to Sue letter which I received on: 01/12/2024. (NOTE: If it

did issue a Right to Sue letter, you **must attach** one copy of the decision to **each** copy of the complaint; failure to do so will delay the initiation of your case.)

13. I am complaining in this action of the following types of actions by the defendants:

- a. ☐ Failure to provide me with reasonable accommodations to the application process
- b. ☐ Failure to employ me
- c. ☐ Termination of my employment
- d. ☐ Failure to promote me
- e. ☐ Failure to provide me with reasonable accommodations so I can perform the essential functions of my job
- f. ☒ Harassment on the basis of my sex
- g. ☒ Harassment on the basis of unequal terms and conditions of my employment
- h. ☐ Retaliation because I complained about discrimination or harassment directed toward me
- i. ☐ Retaliation because I complained about discrimination or harassment directed toward others

j. ☒ Other actions (please describe) Failed to comply with the EEOC mediation & conciliation efforts.

14. Defendant's conduct is discriminatory with respect to which of the following (check all that apply):

- a. ☒ Race
- b. ☐ Color
- c. ☒ Sex
- d. ☐ Religion
- e. ☐ National Origin
- f. ☒ Sexual Harassment
- g. ☐ Age \_\_\_\_\_ Date of birth \_\_\_\_\_
- h. ☐ Disability  
Are you incorrectly perceived as being disabled by your employer?  
☐ yes ☐ no

15. I believe that I was ☒ /was not ☐ intentionally discriminated against by the defendant(s).

16. I believe that the defendant(s) is/are \_\_\_\_\_ is not/are not ☒ still committing these acts against me. (If you answer is that the acts are not still being committed, state when: 12/10/2022 and why the defendant(s) stopped committing these acts against you: I am no longer employed with the company.)

17. A copy of the charge to the Equal Employment Opportunity Commission is attached to this complaint and is submitted as a brief statement of the facts of my claim. (NOTE: You must attach a copy of the original complaint you filed with the Equal Employment Opportunity Commission and a copy of the Equal Employment Opportunity Commission affidavit to this complaint; failure to do so will delay initiation of your case.)

18. The Equal Employment Opportunity Commission (check one):

☐ has not issued a Right to sue letter  
☒ has issued a Right to sue letter, which I received on 06/12/2024

19. State here as briefly as possible the facts of your case. Describe how each defendant is involved, including dates and places. Do not give any legal arguments or cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. (Use as much space as you need. Attach extra sheets if necessary.)

On December 5<sup>th</sup>, 2022 I was sexually harassed by Neil a manager of the Irish Banshee Pub. I was coming out of the kitchen to go to the bathroom, Neil stopped me and offered me a ride home to save me money on Ubers, I said yes. Later that night, we closed down the bar and restaurant, as we're heading out Neil wanted to smoke a cigarette and I took one. Me and Neil engaged into conversation about Christmas, I explained that I was facing financial difficulty providing for my daughter's Christmas due to my hours being cut.

#### **FOR LITIGANTS ALLEGING AGE DISCRIMINATION**

20. Since filing my charge of age discrimination with the Equal Employment Opportunity Commission regarding defendant's alleged discriminatory conduct \_\_\_\_\_ 60 days or more have elapsed \_\_\_\_\_ less than 60 days have elapsed

#### **FOR LITIGANTS ALLEGING AN AMERICANS WITH DISABILITIES ACT CLAIM**

21. I first disclosed my disability to my employer (or my employer first became aware of my disability on \_\_\_\_\_)



## Question 19 Continued...

1. Drastically. Neil then asked me if I knew what “*List Crawlers*” is, I said that I do not know what “*List Crawlers*” is; Neil continued on to say “I don’t think you want to go down that route, but I know this girl who used to work here (*The Irish Banshee Pub*) she makes ton of money doing it”; I then asked Neil “what is *List Crawlers*?”; Neil replied “it’s sex, it’s basically a friends with benefits sort of thing”. I stared at him in disbelief and politely informed him that “*List Crawlers*” is not a route I want to go because I am not that type of girl. We got in Neil’s car heading to take me home.
2. During the ride, Neil decides to bring “*List Crawlers*” up again, stating that he has been married 19 years and he has used “*List Crawlers*” service a few times throughout his marriage. I immediately stopped engaging in conversation. I lived 8 minutes from *The Irish Banshee Pub*, as we are getting off at my exit, I asked Neil if we could stop at the store on the corner near my home, Neil agreed and then asked if the store sold beer and if it has an ATM, I confirmed that the store does sell beer and has an ATM. We go into the store and grab the things we needed, as we are exiting I noticed Neil did not stop at the ATM, so I asked him “you didn’t want to stop at the ATM?”; Neil then says “umm no, not unless you wanted me to come home with you”; I then informed Neil that I have already declined to that sort of thing (sex) and that it is not my cup of tea. I then decided it was best for me to walk the rest of the way home, we parted ways.
3. In December of 2022, I resigned from my position at *The Irish Banshee Pub* as a line cook due to my hours not improving and I felt very uneasy and uncomfortable since the sexual harassment from Neil.
4. Prior to my resigning, I did ask Connor Hawkins about the reasoning for my hours being cut from 32+ hours a week to 16 hours or less. Connor informed me that there were really no hours available, I in turn asked Connor “if there are no hours available then why are the male cooks receiving all of their hours including overtime?”. Connor did not have an answer for me, he only offered a janitorial position cleaning the bar, bathrooms, and dining areas in addition to the line cook position. I declined the janitorial employee: because that is not the position I was originally hired for, and I felt discriminated against being that I was the only African American employee; and the only female cook. The male cooks were also receiving higher pay than I was, for the same job title and responsibilities.
5. On 12/19/2023, a year after filing a charge with the EEOC a mediation was conducted with a mediator, Connor Hawkins, and myself. The mediation failed because after I stated my reasoning for filing a charge with the EEOC, I was asked by the mediator to give a settlement number and I gave \$23,000, the mediator then went back to Connor

informing him of the amount and Connor declined, the mediator then came back to me and asked me to go below \$10,000 and I then offered \$8500, the mediator then went to Connor informing him of the new and this time Connor declined stating to the mediator he is not settling for any amount that is 3 or 5 figures and that he was not going to settle with me for no more than \$1,000. I declined the \$1,000 settlement offer, which then led to the charge to be entered into investigation. I then received a *Letter of Determination* on 04/09/2024 from the EEOC, stating that the Respondent (*The Irish Banshee Pub*) has failed to respond to their efforts. The charge was then moved into conciliation.

6. On 06/12/2024, I then received a *Right to Sue* letter stating that conciliation failed and that the EEOC will not file suit against the respondent (*The Irish Banshee Pub*).

22. The date on which I first asked my employer for reasonable accommodation of my disability is \_\_\_\_\_  
\_\_\_\_\_
23. The reasonable accommodations for my disability (if any) that my employer provided to me are: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
24. The reasonable accommodation provided to me by my employer were \_\_\_\_/were not \_\_\_\_ effective.

**WHEREFORE**, I respectfully request this Court to grant me such relief as may be appropriate, including injunctive orders, damages, costs and attorney's fees.

Dated: 06/27/2024

Quinn Crutcher

Plaintiff's Signature





**U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION  
Buffalo Local Office**

Olympic Towers  
300 Pearl Street, Suite 450  
Intake Information Group: (800) 669-4000  
Intake Information Group TTY: (800) 669-6820  
Buffalo Direct Dial: (716) 541-5007  
FAX BUFFAXMAIN@EEOC.GOV  
Website: [www.eeoc.gov](http://www.eeoc.gov)

**Charging Party**

Quania Crittenden  
29 Roswell Place  
Tonawanda, NY 14150

**Charge No:** 525-2023-00477

**Respondent**

The Irish Banshee Pub  
Attention: Conor Hawkins  
257 Franklin St.  
Buffalo, NY 14202

**Respondent Attorney**

Chanel T. McCarthy  
Gross Shuman, PC  
471 Delaware Ave.  
Buffalo, NY 14202

**DETERMINATION**

On behalf of the U.S. Equal Employment Opportunity Commission ("Commission"), I issue the following determination on the merits of the subject charge filed under Title VII of the Civil Rights Act of 1964, as amended (Title VII) and the Equal Pay Act (EPA.) Respondent is an employer within the meaning of Title VII and the EPA. All requirements for coverage have been met.

Charging Party, a Cook alleges that she was sexually harassed and paid at a lower hourly rate because of her race/Black and sex/female, and that in retaliation for having complained about race and sex discrimination, her work hours were reduced, and she was constructively discharged in December of 2022.

On July 28, 2023, EEOC sent to Respondent a Notice of Charge with a copy of Charging Party's charge of discrimination. Respondent was asked to produce a position statement within 30 days of the Notice of Charge. The EEOC also sent to Respondent a Request for Information letter via

EEOC Portal which response was due with the position statement. Respondent logged in EEOC Portal, but it never produced a position statement or a request for information response. Respondent was also offered the opportunity to mediate the case. On December 19, 2023, a follow up notification was sent to Respondent and Respondent's Legal Representative, Chanel T. McCarthy asking for a request for information response and position statement no later than January 3, 2024. No response was received. Finally, on February 16, 2024, EEOC sent to Respondent and Respondent's Legal Representative an Adverse Inference notification indicating that if within 10-days a response to the charge of discrimination and a request for information response were not received, the EEOC was going to give credit to Charging Party's allegations. However, no response was received.

The Commission has made adequate efforts to obtain a response from Respondent. However, Respondent has failed to produce a response. Consequently, the Commission has determined that Respondent violated Title VII and the EPA by subjecting Charging Party to sexual harassment and paying Charging Party at a lower hourly rate because of her race and sex, and subjecting Charging Party to retaliatory actions by reducing her scheduled hours which resulted in her constructive discharge.

This determination is final. The ADA requires that, if the Commission determines that there is reasonable cause to believe that violations have occurred, it shall endeavor to eliminate the alleged unlawful employment practices by informal methods of conference, conciliation, and persuasion. Having determined that there is reason to believe that violations have occurred, the Commission now invites Respondent to join with it in an effort toward a just resolution of this matter. Enclosed is a letter outlining the proposed terms of conciliation.

Disclosure of information obtained by the Commission during the conciliation process may only be made in accordance with the EPA and Title VII and the Commission's Procedural Regulations. The confidentiality provisions of Section 107 of Title VII and Commission Regulations apply to information obtained during conciliation.

If Respondent declines to enter into conciliation discussions, or when the Commission's representative is unable to secure an acceptable conciliation agreement, the Director shall so inform the parties, advising them of the court enforcement alternatives available to aggrieved persons and the Commission.

On behalf of the Commission:

**Maureen C. Kielt** Digitally signed by Maureen C.  
Kielt  
Date: 2024.04.09 11:54:40 -04'00'

Maureen C. Kielt, Director  
Buffalo Local Office



## U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

Buffalo Local Office  
300 Pearl St, Suite 450  
Buffalo, NY 14202  
(716) 431-5007  
Website: [www.eeoc.gov](http://www.eeoc.gov)

### CONCILIATION FAILURE AND NOTICE OF RIGHTS

(This Notice replaces EEOC FORMS 161, 161-A & 161-B)

Issued On: 06/12/2024

To: Miss Quania Crittenden  
29 Boswell Place  
Tonawanda, NY 14150

Charge No: 525-2023-00477

EEOC Representative and email: NELIDA SANCHEZ  
Senior Investigator  
[nelida.sanchez@eeoc.gov](mailto:nelida.sanchez@eeoc.gov)

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### CONCILIATION FAILURE OF CHARGE

To the person aggrieved: This notice concludes the EEOC's processing of the above-numbered charge. The EEOC found reasonable cause to believe that violations of the statute(s) occurred with respect to some or all of the matters alleged in the charge but could not obtain a settlement with the Respondent that would provide relief for you. In addition, the EEOC has decided that it will not bring suit against the Respondent at this time based on this charge and will close its file in this case. This does not mean that the EEOC is certifying that the Respondent is in compliance with the law, or that the EEOC will not sue the Respondent later or intervene later in your lawsuit if you decide to sue on your own behalf.

### NOTICE OF YOUR RIGHT TO SUE

This is official notice from the EEOC of the dismissal of your charge and of your right to sue. If you choose to file a lawsuit against the respondent(s) on this charge under federal law in federal or state court, **your lawsuit must be filed WITHIN 90 DAYS of your receipt of this notice.** Receipt generally occurs on the date that you (or your representative) view this document. You should keep a record of the date you received this notice. Your right to sue based on this charge will be lost if you do not file a lawsuit in court within 90 days. (The time limit for filing a lawsuit based on a claim under state law may be different.)

If you file suit, based on this charge, please send a copy of your court complaint to this office.

On behalf of the Commission,

**Maureen C. Kielt**

Digitally signed by Maureen C.  
Kielt  
Date: 2024.06.12 13:25:24 -04'00'

---

Maureen Kielt  
Local Office Director

**Cc:**

Chanel T McCarthy  
Gross Shuman, P.C.  
471 Delaware Ave.  
Buffalo, NY 14202

Conor Hawkins  
Banshee Irish Pub  
257 Franklin St.  
Buffalo, NY 14202

Please retain this notice for your records.

## CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

## I. (a) PLAINTIFFS

## DEFENDANTS

**Quania Crittenden**  
(b) County of Residence of First Listed Plaintiff **Erie**  
(EXCEPT IN U.S. PLAINTIFF CASES)

**The Irish Banshee Pub**  
County of Residence of First Listed Defendant **Erie**  
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

(c) Attorneys (Firm Name, Address, and Telephone Number)

Attorneys (If Known)

**24 CV 837**

## II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff  
☒ 3 Federal Question (U.S. Government Not a Party)  
☐ 2 U.S. Government Defendant  
☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

## III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- (For Diversity Cases Only)
- |   |   |                                |   |                                |   |
|---|---|--------------------------------|---|--------------------------------|---|
| Citizen of This State                   | PTF <input checked="" type="checkbox"/> 1 | DEF <input type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State     | PTF <input type="checkbox"/> 4 | DEF <input checked="" type="checkbox"/> 4 |
| Citizen of Another State                | <input type="checkbox"/> 2                | <input type="checkbox"/> 2     | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5     | <input type="checkbox"/> 5                |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3                | <input type="checkbox"/> 3     | Foreign Nation  | <input type="checkbox"/> 6     | <input type="checkbox"/> 6                |

## IV. NATURE OF SUIT (Place an "X" in One Box Only)

Click here for: Nature of Suit Code Descriptions.

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES	
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	<b>PERSONAL INJURY</b> <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice	<b>PERSONAL INJURY</b> <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability <b>PERSONAL PROPERTY</b> <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other <b>LABOR</b> <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act <b>IMMIGRATION</b> <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 <b>PROPERTY RIGHTS</b> <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent - Abbreviated New Drug Application <input type="checkbox"/> 840 Trademark <input type="checkbox"/> 880 Defend Trade Secrets Act of 2016 <b>SOCIAL SECURITY</b> <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) <b>FEDERAL TAX SUITS</b> <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS - Third Party 26 USC 7609	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit (15 USC 1681 or 1692) <input type="checkbox"/> 485 Telephone Consumer Protection Act <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
<b>REAL PROPERTY</b> <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<b>CIVIL RIGHTS</b> <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input checked="" type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education	<b>PRISONER PETITIONS</b> <b>Habeas Corpus:</b> <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <b>Other:</b> <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement			

## V. ORIGIN (Place an "X" in One Box Only)

- ☒ 1 Original Proceeding  
☐ 2 Removed from State Court  
☐ 3 Remanded from Appellate Court  
☐ 4 Reinstated or Reopened  
☐ 5 Transferred from Another District (specify)  
☐ 6 Multidistrict Litigation - Transfer  
☐ 8 Multidistrict Litigation - Direct File

## VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):

Brief description of cause:

## VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.

DEMAND \$

CHECK YES only if demanded in complaint:

JURY DEMAND: ☐ Yes ☐ No

## VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE

DOCKET NUMBER

DATE

SIGNATURE OF ATTORNEY OF RECORD

FOR OFFICE USE ONLY

RECEIPT #

AMOUNT

APPLYING IFP

JUDGE

MAG. JUDGE